DECLARATION OF COUNSEL

I, Curtis L. Briggs, declare:

I am the attorney of record for defendant KWOK CHEUNG CHOW herein.

2. The statements in the accompanying Offer of Proof are true and correct to the best of my knowledge, based on my information and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of December, 2015, at San Francisco, California.

/s/ CURTIS L. BRIGGS

CURTIS L. BRIGGS

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